



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

JUL 14 2015

Mr. Chris Neaville
The Doe Run Company
881 Main Street
Herculaneum, Missouri 63048

RE: Post-Removal Site Control Plan, Desloge Mine Tailings Site, May 2015

Dear Mr. Neaville:

This letter will provide the response of the U.S. Environmental Protection Agency, Region 7 to the Draft Post-Removal Site Control Plan (PRSCP) submitted by the Doe Run Company on May 8, 2015. The EPA has also enclosed comments from the Missouri Department of Natural Resources.

Please review these comments and resubmit the document per the conditions of the AOC (EPA Docket No. VII-94-F-0015).

General Comments

1. Throughout the document there is discussion with regard to directly vegetating on tailings. Please give more detail on the steps taken to revegetate the tailings (e.g., biosolids application rates, seed mix, etc.).
2. There doesn't appear to be a contact from the St. Francois Environmental Corporation (SFCEC) copied on this document. Was this document developed by Doe Run along with the cooperation of SFCEC?
3. Please note that under the AOC the EPA retains the right to perform random inspections at the site to check on conditions. If issues are discovered, the EPA will report these issues to the respondents. If these issues are time sensitive, the agency will expect the respondents to address the issues in accordance with the AOC.
4. In the past the site was used as a designated soil repository for residential properties. Will the respondents continue to use any of the areas as soil repositories or will this officially close out the repository?

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Specific Comments

1. Page 2, paragraph 1, last sentence: Please review the last sentence and delete either "the" or "this" before "Post-Removal Site Control Plan (PRSCP)."
2. Page 3, paragraph 1: Please note in this paragraph that one of the primary objectives of the work was to control wind erosion of mine waste at the site. For more information please see the 1994 EECA for the site.
3. Page 14, Section 4.4, paragraph 2: Site trespass is a reoccurring issue at the Desloge pile. The EPA recommends locked gates during overnight hours to prevent trespass. This is noted on Page 15 but please note that the gates have not been locked when the EPA has visited the site.
4. Page 15, Section 4.7: It is unlikely that inspections will cease at this site since mine waste was left in place and maintenance will be required periodically.
5. Page 17, Section 5.1.1: The EPA requests the soil nutrient tests along with the fertilizer/lime recommendations for the areas subject to reseeded/fertilizing. The EPA should receive these before seeding and fertilizing/liming occurs. These documents can be submitted in electronic format or hard copy.
6. Page 17, Section 5.1.1: Will the respondents continue to apply biosolids as part of the revegetation plan? If biosolids will be used, please provide more detail to the EPA regarding application rates, sources of biosolids, schedule, etc.

Please contact me if you have questions or concerns regarding my comments. I can be reached at (913) 551-7358 or gunter.jason@epa.gov

Sincerely,



 Jason Gunter
Remedial Project Manager
Special Emphasis Remedial Branch
Superfund Division

Enclosure

cc: Mr. Brandon Wiles, MDNR



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

June 1, 2015

Mr. Jason Gunter
Remedial Project Manager
U.S Environmental Protection Agency
Region 7 – Superfund Branch
11201 Renner Blvd.
Lenexa, KS 66219

RE: Post-Removal Site Control Plan (PRSCP) for the Desloge Mine Tailings Superfund Site in St. Francois County, Missouri.

Dear Mr. Gunter:

The Missouri Department of Natural Resources' (department) Hazardous Waste Program (HWP), Superfund Section has reviewed the "Post-Removal Site Control Plan (PRSCP) for the Desloge Mine Tailings Superfund Site in St. Francois County, Missouri" dated May 2015. The following comments are provided for your consideration.

1. The department should be notified prior to future semi-annual inspections for the site in order for possible attendance.
2. It is the departments understanding that the Desloge Mine Tailings Site was used for a soil repository. The PRSCP does not state anything about the site being utilized for a repository for contaminated yard soil. Please include this information within the plan and include which site number the soil repository was located on.
3. Page 2, Section 1.0 Introduction states: "Construction Completion Reports, documenting the work that was completed in Phase A and Phase B as part of the removal action activities for the Desloge site, were developed separately from this Post-Removal Site Control Plan". To our knowledge, the department has not received for review and comment a Construction Completion Report for the work that was completed for sites 1 through 7, that make up Phase A and Phase B as part of the removal action activities. Per the last Progress report for the site dated January 9, 2015, it stated that work will continue on the Site 7 Construction Completion Reports. It is unclear to the department if we will be receiving Construction Completion Reports for the remaining sites that make up Phase A and Phase B of the removal action. The department did not receive the Construction Completion Reports within the 30 day schedule set forth in the AOC.
4. We received the Removal Action Report (RAR) for the Big River Mine Tailings Site 6 in February of 2014. The RAR documented the completed construction activities that took place during Phase B of the removal action, which includes Site 5, Site 6, and Site 7. The PRSCP describes the activities that were performed on Sites 1 through 7 in order to maintain the effectiveness and integrity of the removal action but the department is

unclear on whether we will be receiving a RAR for all of the other sites within the Desloge Mine Tailings site which would include Sites 1 through 4. To our knowledge, the department has not received for review and comment a RAR for Sites 1 through 4 of the Desloge Mine Tailings Site.

5. In the Administrative Order on Consent (AOC) for the Removal Action for the Big River Mine Tailings Superfund Site, EPA Docket No. VII-94-F-0015, page 14 under the heading Design Analysis and Removal Action Work Plan, it is stated: "At the same time that Respondents submit the Removal Action Final Report, Respondents shall submit for EPA review and approval a Post-Removal Site Control Plan. This plan shall describe the activities that Respondents will perform in order to maintain the long-term effectiveness and protectiveness of the removal action following EPA approval, Respondents shall implement the Post-Removal Site Control Plan". The department did not receive the PRSCP within the 30 day schedule set forth in the AOC.
6. In the AOC for the Removal Action for the Big River Mine Tailings Superfund Site, Docket No. VII-94-F-0015, page 7 under the heading Appendix A, Statement of Work, Schedule, it is stated/indicated the Respondent is required to submit Operation and Maintenance Reports (O&M) every five years, starting five years after the EPA approval of the Final Removal Action Report. It is to our understanding these O&M Reports should be submitted to the EPA and the department in or about July-September 2020, depending on what date the EPA approves this Removal Action Final Report.
7. The last quarterly progress report that we received dated April 13, 2015, stated that the vegetation maintenance activities on site are ongoing and this included the use of biosolids on portions of the site that were vegetated during the completion of the removal activities. It is unclear to us if biosolids are still being utilized on site to enhance vegetation per the last progress report. This detail needs to be included in the PRSCP clarifying if biosolid application is still being used onsite.

Thank you for the opportunity to review and comment on the aforementioned document. If you have any further questions regarding this letter, please do not hesitate to contact me at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65101-0176, by telephone at (573) 526-4208, or by email at brandon.wiles@dnr.mo.gov

Sincerely,

HAZARDOUS WASTE PROGRAM



Brandon Wiles
Project Manager
Superfund Section

BW:js